

Comment Summary and Responses

Comment Deadline: October 18, 2018

Amendment to the Water Quality Control Plan for the San Francisco Bay Basin to Establish
a Total Maximum Daily Load (TMDL) for Sediment in the Pescadero-Butano Watershed and
an Implementation Plan to Achieve the TMDL and Related Habitat Enhancement Goals

Comments Received:

Organization	Representative
County of San Mateo, Department of Public Works (County)	James C. Porter, P.E.
San Mateo County Resource Conservation District (RCD)	Kellyx Nelson

County of San Mateo, Department of Public Works		
No.	Comment Summary	Response
1	In the introductory remarks the County acknowledges and appreciates Water Board's efforts to establish a total maximum daily load (TMDL) for sediment in the Pescadero-Butano watershed and states its support for the overall goals and objectives of the TMDL and the implementation plan.	The State Board notes the County's support of the goals and objectives of the TMDL.
2	The County states that despite inadequate responses to several comments made during the Regional Board's public review process (i.e., technical components of the analysis, development of a more complete sediment budget, re-evaluating numeric targets), the County remains supportive and highlights that its Stream	<p>The State Board notes the County's support for the goals and objectives of the TMDL.</p> <p>The State Board finds that Regional Water Board staff provided in-depth responses to all of the comments previously submitted by the County. The comments and responses are available at:</p>

County of San Mateo, Department of Public Works

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	Maintenance Programs aligns with the goals and objectives of the TMDL.	<p>https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/pescadero/Item%206%2002%20App%20D%20Responses%20to%20Comments.pdf).</p> <p>The County's submission to State Board does not explain why the Regional Board's prior responses were inadequate. Scientific peer reviewers found the sediment budget and the numeric targets to be based on sound scientific knowledge, methods, and practices. Therefore, staff believe the issues raised by the County have been adequately addressed.</p>
3	<p>The County describes the Maintenance Program and how it aligns with the TMDL goals.</p> <p>The County is currently updating its Stream Maintenance Program Manual for routine maintenance. The Manual describes routine maintenance activities and defines standards, conservation outcomes, impact and avoidance measures, best management practices (BMPs), and mitigation options. The County believes the Maintenance Program will reduce road-related sedimentation and help meet the TMDL sediment reduction targets.</p>	<p>Comment noted.</p> <p>We note that the Regional Water Board staff has worked with the County in developing its Stream Maintenance Program and appreciates the collaborative approach.</p>
4	The County states its commitment to collaborate and partner with local organizations, such as the San Mateo Resource Conservation District (RCD) to support smaller-scale habitat restoration and watershed improvement projects.	The State Board appreciates the County's ongoing and future collaboration with the RCD and other local organizations to support habitat restoration and watershed improvement projects.

County of San Mateo, Department of Public Works

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5	<p>The County states that it is currently seeking programmatic authorizations for the Maintenance Program from the Regional Water Board and other regulatory agencies and that it is looking forward to working with the Regional Water Board collaboratively on this process. The County requests that the State Board support the County in working with the Regional Water Board to expedite the authorization of the Maintenance Program and states that the sooner the County is granted authorization for the Maintenance Program, the sooner the County can begin supporting many of the goals of the TMDL.</p>	<p>State Board staff has confirmed that Regional Water Board staff have not yet received a Final Maintenance Program Manual or an application for a Section 401 Certification/WDR for consideration.</p> <p>Regional Water Board will consider the County's Section 401 Certification/WDR application once it is submitted, to ensure that the work will be protective of water quality.</p> <p>The State Board notes that the Regional Water Board has adopted Stream Maintenance Program orders for five other parts of the Bay (Marin, Napa, Sonoma, Livermore, and Santa Clara Valley) and this action would be consistent with those other adoptions.</p>
6	<p>The County recommends that the State Board closely review its past comments to guide the development of the upcoming San Gregorio Creek watershed TMDL. The County also recommends early involvement with County staff throughout the TMDL development process.</p>	<p>Comment noted.</p>
7	<p>The County states that achieving the goals of the TMDL requires collaboration and coordination amongst many agencies and hopes that the Water Board can facilitate such coordination. The County also states its expectation that the Regional Water Board will continue to maintain communication providing guidance for implementation.</p>	<p>Comment noted.</p> <p>The State Board confirms that Regional Board Water Board staff intend to maintain open lines of communication and to coordinate with the County to implement the TMDL and the Habitat Enhancement Plan. Staff also will continue to actively participate in the technical advisory and project coordination committees in the Pescadero-Butano Watershed.</p>

San Mateo County Resource Conservation District (RCD)		
No.	Comment Summary	Response
8	The San Mateo Resource Conservation District (RCD) indicates its support for the TMDL and states its appreciation for the revisions to the Basin Plan amendment that the Water Board made to address some key concerns raised in its comment letter of March 14, 2018.	State Water Board staff appreciates the RCD's support of the goals and objectives of the TMDL.
9	The RCD states its commitment to continue collaborating with the Regional Water Board and other partners to achieve sediment reductions and habitat enhancements necessary for recovery of fisheries in the watershed. The RCD highlights recent projects that it has implemented to support the TMDL.	Comment noted.
10	The RCD states that due to the amount of time required to secure 401 Certifications and its plan to implement multiple sediment reduction projects in the watershed in near future, it is imperative that the Regional Water Board allocate additional staff resources to support timely implementation of the TMDL-supportive projects.	<p>The State Board notes that the Regional Water Board is committed to collaborating with the RCD and other agencies to implement projects to support the TMDL goals. The recently implemented projects provide good examples of efficient coordination with the resource agencies and the local organizations.</p> <p>Comment noted on the 401 Certification timeline. The State Board notes that RCD's early communication and coordination with Regional Water Board staff have helped facilitate timely project approvals.</p>